

Attleboro Redevelopment Authority
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Attleboro, Massachusetts 02703
508-222-4012
www.cityofattleboro.us/ARA.htm



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R01-06-C-023a

December 14, 2005

SDMS DocID

456159

6-17 Hazel Street

Ms. Diane Kelley
Regional Brownfields Coordinator
U.S. Environmental Protection Agency
One Congress Street, Suite 1100 (Mail Code HIO)
Boston, MA 02114-2023

RE: Attleboro Brownfields Cleanup Grant

Superfund Records Center
SITE Chpack
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OTHER _____

Dear Ms. Kelley:

I am pleased to submit herewith, on behalf of the City of Attleboro Redevelopment Authority, this application for EPA FY2004 clean-up grants funds in the amount of \$200,000.00 to help finance our *Brownfields Clean-up Project - Swank, Inc.* The applicant is the Attleboro Redevelopment Authority. The purpose of this grant application is to remediate a brownfield site where concentrations of vinyl chloride have been found at 365 times the allowable limit located immediately adjacent to 6-17 Hazel Street in the City of Attleboro, Massachusetts. The City is located in is located in Bristol County, which is comprised of twenty Southeastern Massachusetts communities. According to the Federal Census Bureau, the City's current population is 42,068. The population in the immediate target area is approximately 10,000 persons. As for *special considerations*, please note that the City of Attleboro was designated an Enterprise Zone by the Commonwealth's Economic Assistance Coordinating Council and is empowered to negotiate tax exemption agreements such as TIFs to help stimulate economic development in our City.

As is the case with most other communities throughout the Commonwealth, particularly cities, the City of Attleboro has its share of brownfield sites. Considering its legacy as an old, manufacturing city, with its roots in jewelry, brownfield sites are not uncommon in Attleboro. Many of its industrial sites were, and some still are, located along the City's waterways predominantly along the Bungay River and the Ten Mile River. Fortunately, the ARA and the corporate-base has been able to manifest successes from the calamities that brownfield sites tend to exude. Enclosed within the application there are two recent brownfield site successes that we believe demonstrates not only our resolve to assault them, confront them with confidence, and succeed but also demonstrates our ability to effectively manage and remediate them.

The City of Attleboro will benefit immensely from this grant — from cleaning-up a brownfield site and re-establishing a productive employment and tax generator to helping to stimulate a fairly distressed, inner-city, neighborhood. The targeted site for the cleanup is included downtown specifically Census Tract 6316. Census Tract 6316 is one of two satellite census tracts to the City's urban core/central business district (the other being Census Tract

6315). The site occupies an area of 6± acres and has been used as a heavy industrial manufacturing plant/facility since 1900 and the extent of any contamination has not been monitored since the turn of the century. It is our position that considering the type of use that has occupied the site over the course of the last 100 years, the likelihood of it being a brownfield site is highly plausible given the concentrations of vinyl chloride (a known human carcinogen) found at 365 times the allowable limit. Both the site and building are grossly underutilized and thus grant will remediate a brownfield site. This alone will have a positive impact not only to the environment, but also to the businesses and residences in the immediate vicinity. However, the clean-up that the grant will help finance will have additional, far-reaching, benefits. The resultant benefits of the grant/project will also include:

- ✓ remediating Brownfields sites;
- ✓ improving the natural environment;
- ✓ facilitating a new user which will employ upwards of hundreds employees in the local economy and creating employment opportunities for neighborhood residents;
- ✓ increasing the City property tax rolls;
- ✓ create new mixed income housing units adjacent to the commuter rail line;
- ✓ helping to stop the incipient decline of a distressed neighborhood by eradicating, for all intents and purposes, a vacant, cavernous buildings and other dilapidated eyesore;
- ✓ complementing/solidifying the other corporate citizens in the City of Attleboro industrial sphere;

The Chief Executive Officer of the Attleboro Redevelopment Authority is Chairman Donald Smyth who may be contacted by telephone at 508.828.5448, by facsimile at 508.828.5404, by e-mail at don.smyth@bcsbmail.com, and by mail at 8 North Main St. Suite 403 Street, Attleboro, MA, 02703.

The partnership with US EPA has been a source of hope for the neighborhood residents. The current Brownfields effort has brought resource to the neighborhood and is helping to involve the neighbors in the process of identifying risks and eliminating them. This partnership helps us develop that a stronger bridge between what has been considered an alienated neighborhood and funding sources that the community desperately needs. Through coordinated efforts, significant progress has been made in addressing environmental, social, and economic issues.

The City administration and community are fully behind this initiative. Thank you in advance for your full consideration of this request and for your partnership with the City of Attleboro. Should you have any questions or require any additional information, you may contact me by telephone at 508.222-4012, by e-mail at mmilanoski@verizon.net, and by mail at 8 North Main St. Suite 403 Street, Attleboro, MA. 02703.

Sincerely,



Michael Milanoski, CEcD, AICP

**City of Attleboro Redevelopment Authority
Cleanup Grant Application
December 14, 2005**

A. Application Eligibility

The applicant, the Attleboro's Redevelopment Authority (ARA), is a Body Politic of local government in the Commonwealth of Massachusetts, as such, is eligible to apply for funding under EPA Brownfields RLF Grants Program under MGL 121B. In 2004, EPA awarded to the ARA an assessment grant via Brownfield Cooperative Agreement.

B. Community Notification

In addition to discussing this topic at monthly open public meetings with the ARA and televised public meeting with the City Council the ARA placed a notice in the local major media (The Sun Chronicle Newspaper) notifying the community of the ARA's intent to apply for funding under the EPA Brownfield Revolving Loan Fund Grant programs as well as posting the public notice as required on Massachusetts General Laws for open public meetings. Specifically, the notice indicated that the ARA is submitting a community wide application to EPA and that the full version of the application was available for public review on December 6, 2005 with a one week comment period; and that a public comment period meeting was held on December 9, 2005 by the ARA. A copy public notice is contained as **Attachment 1**.

C. Letter from State Environmental Authority.

A copy of a current letter dated December 12, 2005 from the Massachusetts Department of Environmental Protection is contained in **Attachment 2**.

D. Site Eligibility and Property Ownership Eligibility.

1. a.-b.) 6-17 Hazel Street, Attleboro, MA

There are multiple separate legal parcels for assessment. Individual lots are shown on the Attleboro City Assessor's Map No. 42 as Lots 169-177, 263-265, 279-281, 299, 301 and 302. (See enclosed map)

Site Buildings: Hazel Street

Parking Lot: Intersection of Pearl Street and O'Neil Boulevard-Northwest quadrant

Parking Lot: Intersection of Pearl Street and O'Neil Boulevard-Southeast quadrant

Parking Lot: Intersection of Pearl Street and O'Neil Boulevard-Northeast quadrant

c.) Testing wells off-site immediately adjacent to the property suggest a plume of vinyl chloride, a known carcinogen; at a concentration of 730 parts per billion with the reported allowable concentration is 2 parts per billion and phase one analysis points to manufacturing practices that could lead to such contamination.

d.) The site has been used for the manufacturing of jewelry and belt buckles for over 80 years. The main parcel was initially developed in early 1901 by Attleboro Manufacturing. By 1911, a factory store, automobile and "gas" houses, coal shed and other storage sheds had been constructed at the property. By 1924, the "gas" house was replaced by an underground storage tank (UST) containing gasoline. By 1947, the building had been developed into its present footprint, with a three story brick building constructed in place of the automobile house and UST. The coal shed was also replaced by a boiler room. Dust collectors and a 125,000-gallon aboveground storage tank (AST)

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containing water for the plant's fire suppressant system were built at this time. (Although the AST has since been removed).

Until 1999, the site manufactured jewelry at full capacity and used three nearby parcels for employee parking. Approximately 800 employees worked at the site until 1999 when downsizing reduced staff to less than 100 administrative positions and ceased all manufacturing operations on the site.

e.) The primary environmental concern is the continued spread of vinyl chloride due to the proximity of the site to a residential neighborhood and the regional hospital.

2. No need for site determination at this time.
3. At current time this site is not a.) listed on the National List b.) not subject to any orders under CERCLA by any party and nor is this site c.) controlled or subject to control by the United States Government.
4. Manufacturing at the facility included the use of oil and hazardous materials throughout the plant. Production operation began on the first floor in the tool room where numerous small to medium sized machines existed (hydraulic press, jigsaws, sanders, lathes and other cutting tools). A phase one assessment showed some machines contain swarf (metal chips) coated with oil. Sinks at two locations contained acids and other flammable solvents stored in reagent bottles. Epoxies and lacquers were used to coat machinery that dipped manufactured materials on the plating line. Evidence of oil staining is sporadically present on flooring throughout some production areas. These materials and process of use may have resulted in discharges that would need to be remedied. Three plating lines were located on the second floor of the main building and have been decommissioned. Various chemicals such as acids, bases, solvents, cyanides, and metals (gold, silver and nickel) were used in the plating process. Corrosion of the floor beneath the plating area has occurred in certain areas through the thickness of the second floor slab, onto the first floor beneath. The floor boards under the plating machines that are stained by these materials must be removed by a licensed professional. Existing infrastructure such as drain pipes which carried these chemicals will need to be removed as well. Potential asbestos containing materials are located throughout the building on piping, particularly in the boiler room. It may be present in window glazing and roof trim flashing as well. Based on the construction date of these buildings (1901-1947), lead paint is of concern as well and would need to be tested and remedied if there is indeed lead paint.
5. a.) An updated phase one assessment was conducted in March 2004 by Sage Environmental.
b.) Assessment of the property is estimated to cost up to \$400,000.
c.) The source of funding for the Phase II assessment will come from grants and appropriations the Redevelopment Authority has received over the past year for this project. Including but not limited to \$350,000 from the HUD-VA appropriations bill and \$1,900,000 from a HUD BEDI grant with matching HUD 108 at \$2.85 million.
d.) There is an aggressive two year plan to have all the assessments completed and remediation work to begin.
6. According to the State Department of Environmental Protection's Brownfields coordinator, there are no known additional hazardous materials than those listed above.

Clean-up Grant Application

7. a.) The transfer of property to the City of Attleboro Redevelopment Authority will be done by purchase. Swank Inc, is a willing seller and the city is a willing buyer. The transfer of property to the City of Attleboro Redevelopment Authority will be done at closing that is scheduled for January 15, 2006 and will in no way further contaminate the site. Our goal is to immediately clean the site and turn it over for full re-use to an entity that has a job commitment of 350 jobs
- b.) The City of Attleboro Redevelopment Authority is not responsible for any environmental concerns at this site as all contamination occurred prior to ARA acquisition.
- c.) A phase one assessment was conducted in March 2004 by Sage Environmental. Little if any change would have occurred as the current owner has ceased using the site for manufacturing and has only had administrative offices at the site since 1999.
- d.) The City of Attleboro Redevelopment Authority is not responsible for any environmental concerns at this site. The City of Attleboro Redevelopment Authority is in no way potentially liable for any contamination at this site. The City of Attleboro's Redevelopment Authority has no relationships with potential liability to the best of our knowledge.
- e.) Swank, Inc is the current property owner and has owned and operated at this location for the past 80+ years. The relationship with Swank is that they are a willing seller and the Redevelopment Authority is the willing buyer.
- f.) The City of Attleboro Redevelopment Authority is not responsible for any environmental concerns at this site.
- g.) It is in the City of Attleboro's and the Redevelopment Authority's best interest to comply and assist with any and all parties involved in the clean-up effort of 6-17 Hazel Street. The Redevelopment Authority has every intention of doing-so.

E. Cleanup Authority and Oversight Structure

1. The ARA has extensive experience in Brownfields Redevelopment including complying with all state and federal laws to ensure that the cleanup protects human health and the environment. In addition to the ARA staff, environmental consultants and license site professionals hired by the ARA under a competitive procurement provisions of 40 CFR 31.36, the City of Attleboro has a full-time environmental planner who has the technical expertise and training to monitor all assessment and clean-up projects. The State Department of Environmental Protection and the ARA have developed a partnership and will be working together on the project. Therefore depending on the details of the site under remediation, the ARA will prepare the appropriate oversight based on the site specific issues from the ARA's broad team of professionals and consultants. In addition the ARA will require subgrant recipients to enroll in a state response program. Also, the ARA will require all subgrant recipients to provide the ARA with right of access and ability to secure sites in the event of an emergency or default on a loan agreement or non-performance under a subgrant. The ARA will have the legal authority to access and secure all sites that are recipients of a loan or subgrant. See attached letter from the ARA's Legal Council that is contained as **Attachment 3**.

2. At this time it has not been determined if we will need access to adjacent sites. The property sits on one entire city block and therefore is bound by streets and roads.

Clean-up Grant Application

Through off-site immediately adjacent to the site drilling, we have found vinyl chloride concentrations. It has not been determined if they come from the project site or to what extent it spreads. However we are dedicated to remediation of the issue to comply with all EPA standards and requirements. In addition, we have the full support and a great working relationship with the city, local officials, state representatives and agencies and our Congressional delegation. It is certain we can work cooperatively with them and any neighbors, if necessary, to have full access for clean-up.

F. Cost Share

The ARA will provide the require 20% cost share match through a combination of fees, non-ARA cost share match funds, ARA funds, labor, materials, or services that would be from a non-federal source. The ARA will leverage and require all subgrant recipients to provide twenty percent of their project costs to the cleanup projects. Therefore the program will be established such that it will only fund eighty percent of each project costs thereby leveraging other private funds and spreading out the benefit of the cleanup to additional projects and more private investment.

Ranking Criteria for Cleanup Grants

A. Cleanup Grant Proposal Budget Description

The ARA is applying for a cleanup grant and will target downtown depressed areas that are contaminated by hazardous substances, pollutants, or contaminants including hazardous substances co-mingled with petroleum.

Budget Categories	Project Tasks for cleanup grant			Total
	Task 1 Programmatic Costs	Task 2 Operating the Fund		
Personnel	15,000			58,650
Fringe Benefits	2,250			10,350
Travel**	4,000			4,500
Supplies	500			1,500
Contractual*	2,250			15,000
Grants		180,000		180,000
Subtotal	20,000	180,000		200,000
Cost Share	4,000	36,000		40,000
Total	24,000	216,000		240,000
Grand Total				\$240,000

* The ARA will comply with procurement procedures contained in 40 CFR 31.36

** Travel is for staff to attend annual Brownfield-related training conferences.

Task I – Programmatic Costs

The ARA will establish an information repository, encourage public comment, and respond to any related concerns raised by the community. The ARA will prepare a Quality Assurance Project Plan (QAPP) for the sites eligible for cleanup. Public meetings will be advertised. Quarter of the full-time equivalent of dedicated staff time is programmed in this task to manage and market the entire cleanup program. The ARA marketing of this program will be done under this task on a city wide basis as well as the ARA will identify sites and potential reuses and markets for side redevelopment.

Task II – Operating the Fund

The ARA will make grants available as further discussed in this application and work with developers to fund the cleanup.

B. Community Need

1. The target community is the City of Attleboro, Massachusetts and the cleanup will be targeted to the downtown. Attleboro covers an area of 28.29 square miles. The City has a Mayor/Council form of government and is included in the 3rd Massachusetts Congressional District. It is located in Bristol County and is located 32 miles from Boston, 12 miles from Providence, Rhode Island, and 197 miles from New York City.

The City is served by an extensive federal and state highway system, a regional transit authority, rail service and nearby air service. The Greater Attleboro Taunton Regional Transit Authority is the regional public transportation system in the City. Attleboro is also located on the MBTA's Stoughton commuter line, which connects Boston to Providence with two commuter rail stations within the City's boundaries — one is located in the heart of Downtown Attleboro.

The City's current population, according to 2000 data from Federal Census Bureau, is 42,068. The population has increased in every successive decade since 1900. Between 1980 and 2000 alone, the City's population increased by 23%, from 34,196 persons to 42,068 persons. The City's proportion of the City's population aged 60+ is growing. The median household income is \$50,807, which is well below the region's median (\$56,364) — 49.5% of Attleboro households have an income less than the median household income. The per capita income is \$22,660. In 1999, the percentage of persons living in poverty status was 6.2%. In 1999, there were 2,539 households below the poverty level. Of the 351 municipalities in Massachusetts: (a) Attleboro ranked 282nd in *equalized valuation per capita* in 1999, (b) Attleboro ranked 240th in *per capita income* in 1999, and (c) Attleboro ranked 225th in *median family income* in 1999. New residential construction averaged 140 building permits annually between 1990 and 2002. Between 1990 and 2000, the number of households increased by 13%, from 14,180 to 16,019. Notwithstanding this new growth, much of the City's current housing stock was built prior to 1940. Much of the pre-1940 housing stock is concentrated in the urban core with approximately 70% of all such housing units located in and around the urban core (Census Tracts 6314 and 6316).

According to available data from the Bureau of the Census:

- Census Tract 6316 and Census Tract 6314 contain the **highest percentage of minority populations** of the city's eight census tracts. While the minority population represents 8.7% of the total population, the minority population represents 22.4% of Census Tract 6316 and 19.6% of Census Tract 6314 (157% and 125% higher than the city-wide statistic, respectively).
- Census Tract 6316 and Census Tract 6314 contain the **lowest average family incomes** of the city's eight census tracts. While the city-wide median family income was \$59,112, the median family income was \$46,721 in Census Tract 6316 and \$47,361 in Census Tract 6314 (79% and 80% of the city-wide median family income statistic, respectively).
- Demographic data also reveal that the population density in Census Tract 6316 is the **second highest densely settled census tract in the City** — second only to

Census Tract 6314. The population in Census Tract 6316 was 4,203 persons and contains an area of 0.6 square miles. Hence, when extrapolating, the population density in Census Tract 6316 amounts to 7,005 persons per square mile. The population in Census Tract 6314 was 2,703 persons and contains an area of 0.3 square miles. Hence, when extrapolating, the population density in Census Tract 6314 amounts to 9,010 persons per square mile. For comparative purposes, the city-wide population density was 1,529 persons per square mile.

The City of Attleboro has been an employment center in Southeastern Massachusetts for decades and its reliance has been primarily on the manufacturing sector. In 2004, Manufacturing, the largest employment sector, represented 32.4% of total employment, followed by health care/social assistance (17.3%) and retail trade (11.9%), according to the Division of Employment and Training. Also, just as importantly, the City has a large skilled labor pool. Attleboro has long had a higher concentration of jobs in its manufacturing sector than the state as a whole; and while manufacturing employment is declining as the region shifts to a service-based economy, manufacturing remains important to Attleboro. Since 1983 to the present, the annual unemployment rate in Attleboro has consistently been higher than the state's annual unemployment rate. According to the Commonwealth of Massachusetts, Division of Employment Training, the Attleboro unemployment rate for 2004 was 5.5% as compared to the state's 2004 unemployment rate of 5.1%.

2. The City of Attleboro will benefit immensely from this grant — from cleaning-up a Brownfields site and re-establishing a productive employment and tax generator to helping to stimulate a fairly distressed, inner-city, neighborhood. The targeted sites are located in census tracts in the City's urban core/central business district. This grant will help assess and remediate Brownfields sites in the City of Attleboro's downtown. This alone will have a positive impact not only to the environment, but also to the businesses and residences within the City of Attleboro. However, the assessment and remediation that the grant will help finance will have additional, far-reaching, benefits. The resultant benefits of the grant/project will also include:

- ✓ remediating Brownfields sites;
- ✓ improving the natural environment;
- ✓ facilitating a new user which will employ upwards of hundreds employees in the local economy and creating employment opportunities for neighborhood residents;
- ✓ increasing the City property tax rolls;
- ✓ create new mixed income housing units adjacent to the commuter rail line;
- ✓ helping to stop the incipient decline of a distressed neighborhood by eradicating, for all intents and purposes, a vacant, cavernous buildings and other dilapidated eyesore;
- ✓ complementing/solidifying the other corporate citizens in the City of Attleboro industrial sphere;

The ARA is applying for funding under the cleanup grant because it is imperative to offer assistance to developers who are interested in redeveloping unproductive site to productive uses but given the cost of doing so vs. greenfield development that is less expensive and more easily available it is critical of offer incentive. These incentives such

as a low interest rate and subgrants, will allow the ARA to entice developers to invest their private dollars to assess and remediate brownfields.

The targeted downtown neighborhoods will benefit significantly if the cleanup is awarded as the removal of contamination and blight prevents further potential health risks to the residents. In addition developers will be strongly encouraged to incorporate smart growth elements into their projects that provide for opportunities to increase exercise, improve air quality, and stabilize and invest in the neighborhoods. These projects will also provide permanent jobs as well as temporary construction jobs that for a community that suffer from high unemployment rates, this is an important boost to the local economy as well as putting these properties back on the tax rolls with a productive use.

3. Brownfields are crippling economic and community development in the City of Attleboro which we have a significant number of Brownfields sites that number over 40 sites that have been inventoried in the downtown alone that are next to homes, schools, and waterways. However, we anticipate that there are significantly higher numbers of Brownfields yet to be documented. Considering its legacy as an old, manufacturing city, with its roots in jewelry, Brownfields sites are not uncommon. Many of its industrial sites were, and some still are, located along the City's waterways predominantly along the Bungay River and the Ten Mile River. Fortunately, the City and the corporate-base have been able to manifest successes from the calamities that Brownfields sites tend to exude.

The primary environmental concern is the continued spread of vinyl chloride due to the proximity of the site in a depressed residential neighborhood and near the regional hospital. Testing wells off-site immediately adjacent to the some of the targeted sites suggest a plume of vinyl chloride, a known human carcinogen; at a concentration of 730 parts per billion when the reported allowable concentration is only 2 parts per billion.

By remediating contaminated property, Attleboro becomes more appealing to business developers who would otherwise pass over Attleboro to purchase and develop properties in Greenfields and avoid the large and sometimes unknown cost of assessment and remediation. Brownfields have taken a huge toll on the economy of Attleboro, affecting residents in several ways such as higher taxes due to loss of industrial base, and not enough jobs for those who are unemployed, and the environmental consequences of these hazardous sites on the human body.

C. Sustainable Reuse of Brownfields

In conjunction with our regional Department of Environmental Protection, and their Brownfields representatives whom we are partnering with and working with them hand in hand to ensure that these projects are done in a manner to not only remediates the sites, but to make sure the means are in place to protect the environment in and around the property for years to come with the appropriate development regulations to achieve these goals

1. The funds from this cleanup will be an economic catalyst to prevent pollution and reduce resource consumption. The redevelopment of these brownfield sites into light industry productive properties will immediately reduce the contamination in the targeted neighborhoods by preventing further contamination of the rivers and adjacent lots. Development plans will include open space with plantings and trees, which will improve air quality and promote outside active living. The ARA is a participant in the LEED program and strongly encourages developers to participate in the program thereby illustrating the City of Attleboro's long-term commitment to preventing pollution and

reducing resource consumption through plan of more energy efficient construction. cleanup funds will entice developers to begin the expensive task of remediating and redeveloping blighted and slummed properties while preventing pollution and reducing resource consumption. All future developments and industry on sponsored sites will incorporate close loop systems of filtration as well as double lined AST and UST's. Any and all activities will fully comply with Federal EPA and State DEP rules and regulations to ensure the purest environment possible. In addition, utilities within the building, practical as possible, will be re-outfitted to be energy efficient.

2. The cleanup and development of contaminated sites will significantly contribute to the economy of the City of Attleboro and the greater Attleboro area. Permanent and temporary construction jobs will be created. This project will create over 350 new manufacturing jobs in downtown Attleboro that the company has committed to if all brownfield funding sources are secured. With these new jobs come a vibrant tax base and economic boost the city very much needs. This new company and its employees will spend their dollars at local business and restaurants, potentially relocate themselves within the neighborhood and at a minimum make use of the commuter rail train in the city. The surrounding roads, sidewalks and parking lots have practically been abandoned but will once again flourish as the new employees take to their jobs. All of these are economic and environmental benefits. Some of the surrounding property that are currently parking lots could potentially be resurfaced as open space and utilized by the employees and community-at-large as recreational sites, and in turn furthering the clean-up of the area thus increasing property values for home and business owners in the immediate area. The improvements of civic structures and beautification in the heart of downtown will elevate property values for surrounding property owners further generating increased tax revenues. The cleanup of brownfields for compliments other redevelopment initiatives in downtown to make the area a more attractive place to live, visit and do business ultimately attracting additional capital and business investment.
3. The plan is use cleanup funds to cleanup and redevelop blighted and underutilized properties in the City of Attleboro with focus on downtown that complements other initiatives that the ARA is focusing on including housing and green space redevelopment.
4. The ARA plans on reusing existing infrastructure in the downtown as it is already installed, however there may be upgrades or replacement that may be required due to the age of the system that may date back to the late 1800's. However, no new roads, or extension of utility systems are envisioned as there is a focus to on site in the downtown. On the other hand there will be improvements to the pedestrian transportation network that may incorporate new bike / walking trails or extension of the river walk.
5. To prevent future brownfields the ARA has created a program that meets with and identifies properties that are not in compliance with existing codes and regulations as well as struggling enterprises that are marginal at best and do not have the expertise or funds to invest in understanding their potential brownfields issues. In those cases the ARA is proactive in providing that expertise free of charge and assisting in partnering both with expertise and funding to not let the site turn into an abandoned brownfield. This includes tracking down abandon sites or site under tax title and working with land owners to remediate their sites.
6. As previously stated the ARA strongly supports the U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) rating system. In addition a

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significant portion of the downtown now or soon will be incorporated in an Urban Renewal Plan that by definition in the plan requires certification in LEED.

D. Creation and/or Preservation of Greenspace /Open Space or Nonprofit Purpose

The funding of the cleanup will contribute to the City-wide efforts to create green space/open space for the targeted neighborhoods. The remediation of blighted properties brings the community forward into a cleaner and brighter future for residents. The ARA will facilitate the preservation of open space and recreational property by only awarding subgrants to applicants that redevelopment Brownfield sites and as a result must include greenspace and open space in the their plans. This will encourage residents and employees to walk and be active. The development of green space or open space may depend developing pocket parks or open space that is recreationally landscaped, whether for lunch breaks or for playing fields. There is significant potential to create green space in the downtown community in relation with the redevelopment of these brownfields. The City and ARA are will be creating an outdoor open space from one of the surrounding parking lots as part of the downtown redevelopment sites along the Ten Mile River.

Again, there is a great potential for re-landscaped open spaces to be used for recreational purposes. The location of the site is also with walking distance of the Attleboro commuter rail station and therefore would promote walking to the station, work and into the downtown for shopping and dining experiences which would encourage those who live outside the community to commute and therefore conserve fuel consumption and reduce gridlock on the roads and highways. As such the City of Attleboro is committed to projects that will reduce blight and improve greenspace and open space for its citizens.

E. Community Involvement

1. In addition to discussing this topic at monthly open public meetings with the ARA and televised pubic meeting with the City Council the ARA placed a notice in the local major media (The Sun Chronicle Newspaper) notifying the community of the ARA's intent to apply for funding under the EPA Brownfield Cleanup Grant programs as well as posting the public notice as required on Massachusetts General Laws for open public meetings. Specifically, the notice indicated that the ARA is submitting a community wide application to EPA and that the full version of the application was available for public review on December 6, 2005 with a one week comment period; and that a public comment period meeting was held on December 9, 2005 by the ARA. The ARA has requested and received input on this project from area neighbors and business owners at every step of the process. In this proposal the residential neighbors as well as neighboring business are important and their input is greatly appreciated and actively solicited. The process is to remain open to the public at all times. We have conducted public hearings with both the City Council and the ARA including public notice. In addition to hearings and informational meetings, the city plans to create question and answer flyers and distribute them to the citizens who reside and work nearby to the facility. One of the highest priorities is the nearby hospital that we plan to give our full attention to in order to assure they are in accord with our efforts. However, this site and its proximity to the city hospital hold a special benefit to the clean up. The Sturdy Memorial Hospital is less than 1000 feet away and the ARA feel it is necessary to clean-up the site to ensure the purest environment to surround the Hospital facility. Therefore

remediation at this site not only improves the quality of ground, air and environment for those who work on the site, it also helps ensure a clean, safe and environmentally acceptable setting for the Hospital. Mailings and meetings will coincide with the submittal of this proposal as well as with each step of the process as we move forward. The idea is to involve the community as much as possible in a transparent manor, as the potential for the re-use of this site will most certainly better our community and the lives of those involved. The ARA will prepare and implement a Community Relations Plan (CRP) with the assistance and cooperation of the borrower to interview residents and community leaders, local officials and public interest groups, disseminate information on the proposed project throughout the targeted downtown, establish a local information repository at the site or at the library that includes public information supplied by both the ARA and the borrower related to the proposed response action. In addition the Borrower will follow appropriate protocol in analyzing and evaluating brownfields cleanup alternatives and making this information available for review and public comment. All appropriate comments from the community will be incorporated into a final analysis. A Quality Assurance Project Plan (QAPP) will also be prepared setting forth the manner and method of collecting samples to assure the complete removal of all hazardous substances which will be submitted to EPA as review by staff at the ARA. We will require that consultants and contractors prepare a site-specific Quality Assurance Project Plan (QAPP) in accordance with EPA's guidelines for such reports as well as any similar reports that may be required including health and safety plans and project schedules. This offers a plan and track record that can be assessed and utilized as a map and means to measure progress as well as posting on the City and ARA's web site.

2. There have been recent meetings with the Massachusetts Department of Environmental Protection, particularly with our regional Brownfields representatives. The goal is to work with them hand-in-hand to ensure the project is executed in a manner to not only clean-up the existing site but also to make sure the means are in place to protect the environment in and around the property for years to come. Already we have held at least three meetings where not only the regional DEP Brownfields director was on hand, but also the Commonwealth of Massachusetts' Brownfields District Attorney from the Attorney Generals office. The goal is to work together to make certain the job is done efficiently, effectively and completely now to rebuild the integrity of the site and promote economic and environmentally friendly growth.
3. The process has been and will continue to be communicated to the citizens of Attleboro and the neighboring cities and towns through print media. The project and each step throughout will be shared in public forums such as town meetings and public hearings. In addition, we have produced up to date fliers and collateral materials to distribute to the members of the community, especially those in the near vicinity to the site. The City of Attleboro employs Multilanguage capable individuals. Should there be a need to break a language barrier, the need will be met.
4. Community Based Groups: Community based group that is involved with this project is the City of Attleboro Comprehensive Plan Steering Committee which includes over 100 citizens that is developing the City's updated Comprehensive Plan. The contact person is Robert Duffin, Committee Vice-Chair 508-261-2508. This committee is responsible for developing a comprehensive plan for the future growth in the City of Attleboro. This plan is a 10 year priority plan for the City as a whole similar to a Master Plan. In addition

to the community advocacy groups and neighborhood reach-out, we have enjoyed a great working relationship with the Greater Attleboro Chamber of Commerce (Roy Nascimento – 508-222-0801), the Downtown Attleboro Associates, Friends for Attleboro Interested in Revitalization (Don Smyth – 508-828-5448), and the regional planning organization (SRPEDD – Steve Smith 508-824-1367) support and remain involved in this process through every step. The constituents of the surrounding community, and region-at-large, have been well informed and represented throughout this project. Additional contact information is available for each and everyone of these organizations from the ARA and we encourage you to contact them.

F. Reduction of Threats to human Health and the Environment

ARA is committed to an open and transparent process following all existing compliance guidelines in the clean-up of this site. It is in the city's best interest to see to it that this site is fully compliant to be protective of human health as we wish to re-use the site as a vibrant source of employment and tax revenue for downtown Attleboro. We will only use professionals at every level of the project who have documented track records of remediation work that have met full compliance with federal regulations. Our top priority is the neighborhood immediately adjacent to the downtown sites and the Sturdy Memorial Hospital which is nearby. However, this downtown site and its proximity to the city hospital hold a special benefit to the clean up. The Sturdy Memorial Hospital is less than 1000 feet away and the ARA feels it is necessary to clean-up the site to ensure the purest environment to surround the Hospital facility. Therefore remediation at this site not only improves the quality of ground, air and environment for those who work on the site, it also helps ensure a clean, safe and environmentally acceptable setting for the Hospital.

1. At the targeted site in the downtown these funds will be used for the direct clean-up effort of vinyl chloride, a known human carcinogen. The removal of such a substance is beneficial to the health of all those that come in contact with the site. Initial testing at some sites show concentrations in excess of 700 parts per billion of vinyl chloride whereas the allowed concentration is 2 parts per billion. Soils containing concentrations of petroleum hydrocarbons, PHAs, and lead that exceed standards have the potential to impact groundwater that discharges into the Ten Mile River. Contaminated surface soils will be removed or rendered/capped inaccessible improving the overall environmental conditions. The unhealthy conditions in water and potentially air, when removed, will decrease the possibility of lead exposure, and cancer in downtown that currently experiences higher disease rates than neighboring communities. Through a partnerships with EPA, Mass DEP, and the City of Attleboro a higher quality of life can be achieved for some of the poorest residents in the Commonwealth of Massachusetts and the City of Attleboro.
2. Following meetings with the Massachusetts Department of Environmental Protection, particularly with our regional Brownfields representatives our goal is to work with them hand-in-hand to ensure the projects is executed in a manner to not only clean-up the existing site but also to make sure the means are in place to protect the environment in and around the property for years to come. Already we have held several meetings where not only the regional DEP Brownfields director was on hand, but also the Commonwealth of Massachusetts' Brownfields District Attorney from the Attorney Generals office. The goal is to work together to make certain the job is done efficiently, effectively and

completely now to rebuild the integrity of the site and promote economic and environmentally friendly growth.

3. As previously stated we work hand in hand with the Massachusetts Department of Environmental Protection. The City of Attleboro and the ARA have been in constant contact with local, state and federal officials to ensure cooperation and collaboration since the inception of this project. We are actively seeking the counsel of DEP, MassDevelopment and the EPA to ensure the safety, integrity and protection of the neighborhood. Again, with Sturdy Memorial Hospital in such close proximity to this sight, human health concerns are always at the forefront of this project. That is why we wish to remediate this site, but the wonderful plus to this project is the fact that the facility will be put back into full re-use and bring a vibrant company and workforce to an area that has been depressed for over a decade. It is the health of these new tenants of the building that we concern ourselves with as well. Controls will be put in place to ensure that all business conducted from this day forward on that site fully comply and adhere to the strictest EPA and environmental guidelines set forth regionally and nationally to keep this site safe and clean for generations to come

G. Leveraging of Additional Resources

1. The Executive Director will be contributing 15% of their time the CFO will be contributing 10% of their time of their time for a total of 25% of a full time equivalent or one full time person for the brownfield projects. This will included marketing the program, grant management of the program, and oversight of the environmental responsibilities of the program to carry out all necessary elements. The allocated staff commitment clearly identifies the ARA's level of effort and importance to this program. A portion of the administrative funding will come out of this program but the majority will be out of other programs.
2. Currently we have many agencies committed to this program and several brownfields redevelopment programs in the City of Attleboro. This includes on the City side over half a million dollars in commitment for brownfields development from a Tax Increment Financing (TIF), additional funding from a District Improvement Financing Plan (DIF), as well as over \$800,000 from the ARA. On the state side there is a commitment of \$75,000 from Mass DEP, \$350,000 from Mass BRAC program, and \$500,000 from MassDevelopment. On the federal side from HUD there is \$270,000 in a EDI grant, \$1,900,000 allocated in a BEDI grant, \$2,850,000 in Section 108 loan, and a couple hundred thousand in block grant funds, plus an earlier commitment of \$200,000 from EPA. In addition the private sector has committed several million dollars to redeveloping several brownfields sites.
3. As previously stated and restated here we have committed funds from the City side of over half a million dollars for brownfields development, as well as over \$800,000 from the ARA directly. On the state side there is a commitment of \$75,000 from Mass DEP, \$350,000 from Mass BRAC program, and \$500,000 from MassDevelopment. In addition, on the federal side from HUD there is \$270,000 in a EDI grant, \$1,900,000 allocated in a BEDI grant, \$2,850,000 in Section 108 loan, and a several hundred thousand in block grant funds, and an earlier commitment of \$200,000 from EPA. In addition the private sector has committed several million dollars to redeveloping several brownfields sites.

H. Programmatic Capability

1. The ARA is a full service public development organization with all necessary safeguards in place that is staffed by the Executive Director and Chief Financial Officer among others who are professionally and academically trained and experienced Brownfields and economic development professionals capable of performing the administration and implementation of this program. The Executive Director is also certified by the International Economic Development Council as a Certified Economic Developer CECd. In addition the Executive Director was a featured speaker at this years Brownfields 2005 conference in Denver. Also, for this project a member of the Redevelopment Authority Board of Directors who is also vice-president of a local bank has agreed to lend the professional services of that lending institution to set up and oversee the loan fund in accordance with all prudent lending practices. The ARA will be contracting the technical environmental components for these projects where necessary.

The ARA has extensive experience in Brownfields Redevelopment including complying with all state and federal laws to ensure that the cleanup protects human health and the environment. In addition to the ARA staff, environmental consultants and license site professionals hired by the ARA under a competitive procurement provisions of 40 CFR 31.36, the City of Attleboro has a full-time environmental planner who has the technical expertise and training to monitor all assessment and clean-up projects. Finally, the State Department of Environmental Protection and the ARA have developed a partnership and will be working together on all recipient projects. Therefore depending on the recipient and the details of the site under remediation, the ARA will prepare the appropriate oversight based on the site specific issues from the ARA's broad team of professionals and consultants. Finally the ARA will require loan and subgrant recipients to enroll in a state response program.

The ARA has a long history of undertaking (re)development projects and administering MGL Ch. 121B on behalf of the City of Attleboro. The ARA has extensive experience in the management and development of real estate and was the City's lead agency in the redevelopment of several parcels of land located in the downtown. The two recent Brownfields site successes in downtown that we believe demonstrates not only our resolve to assault them, confront them with confidence, and succeed but also demonstrates our ability to effectively manage and re-mediate them. Examples include:

- ✓ The Bates Building and Klinke Building, both former turn-of-the-century manufacturing plants located in the downtown, were designated as Brownfields sites. The site was one-acre in size and both buildings contained approximately 20,000 square feet of floor area. Attleboro secured a \$500,000 Abandoned Buildings Grant, which was used to acquire the site, raze the building, and clean-up the site. As a result of a successful developer-selection process, the ARA transformed an unproductive eyesore in the heart of the downtown into a four-story, tax generating, 82-unit assisted living facility.
- ✓ The ARA successfully negotiated the purchase of the Balfour Company manufacturing facility located on County Street. The Balfour Company was a 175,000 square foot jewelry manufacturing plant located in the heart of downtown Attleboro. It was in business between 1900 and 1988 and the building laid dormant

Clean-up Grant Application

since then. The city received \$840,000.00 in financial assistance to help finance the purchase of the building/site, clean-up, and eventual construction of the Balfour Riverwalk Park. The 3.2-acre verdant green is now the recreational centerpiece of the City's ongoing downtown revitalization efforts.

- ✓ The ARA is the City's lead agency in the redevelopment of a 4± acre parcel of land also located in the downtown. The "Union Street Redevelopment Project" is an urban renewal plan and will include, among other things, land acquisition, building/structural assessment, demolition, MGL 21-E site assessment and clean-up, relocation, retail/office/residential development as well as the construction of a federally funded 700-vehicle mass transit intermodal facility.
- 2. In addition the ARA staff including the CFO is knowledgeable and proficient with all OMB and GOA requirements. The ARA has received and manages several federal grants that exceed more than fifteen million dollars from federal agencies that include FTA, FHW, HUD, EPA, and EDA. Also the ARA has never been classified as High Risk or had any adverse audit findings under OMB Circular A-102.
- 3. We have recently executed a revised cooperative agreement BF-97119301-1 that was awarded in 11-18-05 with EPA for a brownfields assessment grant. Our 1st quarter report is due December 30, 2005.
- 4. ARA executed a \$200,000 a revised cooperative agreement BF-97119301-1 that was awarded in 11-18-05 with EPA for a brownfields assessment grant however this funds will be expended by May of 2006.
- 5. The greatest accomplishment to date has been the ability to select and move forward with a project that has gained support from local, state and federal entities and agencies as well as have a strong private partnership. The acceptance and willingness to work together enables the ARA to implement major Brownfield revitalization creating hundreds of jobs in downtown Attleboro with full community and political support. This is extremely to revitalizing our depressed downtown areas as we all speak with one voice.

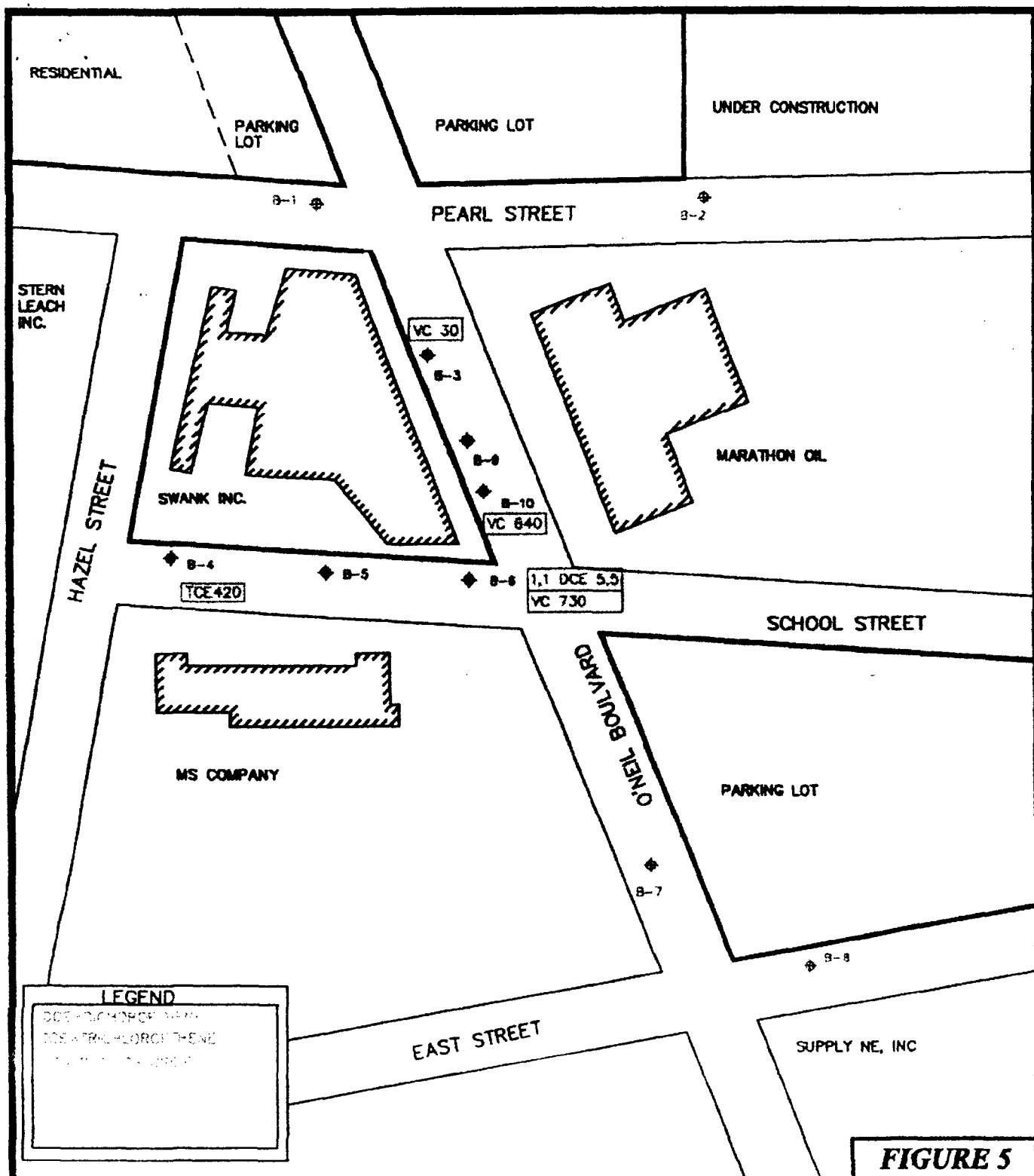


FIGURE 5

SAGE Environmental, Inc.

SAGE Job #: 01704

Customer Job #:

SAGE Drawing #: FIGURE 6

Original Drawing Date: 12/26/93 FRM

Revision Date/Initials:



**GROUNDWATER RCGW-2 EXCEEDANCES
HAZEL STREET
ATTLEBORO, MA**

CONCENTRATIONS IN UG/L (PPB)

NOT TO SCALE



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

STEPHEN R. PRITCHARD
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

December 12, 2005

Ms. Carol Tucker
Regional Brownfields Coordinator
U.S. EPA- New England (Mail Code: HIO)
One Congress Street, Suite 110
Boston, MA 02114-2023

RE: **STATE LETTER OF ACKNOWLEDGEMENT**
City of Attleboro: Brownfields Assessment, Cleanup, and Revolving Loan Funds

Dear Ms. Tucker:

I am writing to support the proposal submitted by the Attleboro Redevelopment Authority (ARA) for funding under the EPA Brownfields Assessment, Cleanup, and Cleanup Revolving Loan Fund Programs. Massachusetts is well positioned to support the efforts of the ARA to undertake assessment and cleanup activities at various sites throughout the City, including the former Swank manufacturing facility.

As you know, the Commonwealth of Massachusetts has taken a number of steps over the last decade to encourage the redevelopment of contaminated properties. In 1993, we privatized our waste site cleanup program, greatly accelerating the rate of cleanups across the state. In 1998 we created the Brownfields Act to offer financial incentives and liability protection designed to promote the cleanup and redevelopment of underutilized parcels. We continue to look for ways to help facilitate the cleanup of brownfields and other contaminated sites, including through proposed changes to the state's cleanup regulations, the Massachusetts Contingency Plan (MCP).

MassDEP has partnered with state and federal agencies, providing technical support for brownfields projects. MassDEP's Southeast Regional Office has worked closely with municipal and regional officials over the years in their efforts to revitalize priority sites throughout the region. If this proposal is selected, we will help make it successful by working with our brownfields partners to assist parties in taking full advantage of these tools to ensure our shared goals are met. We applaud your continued funding of these efforts, and look forward to our continued partnership on this important issue.

Sincerely,

Millie Garcia-Surette, MPH
Deputy Regional Director
MassDEP Southeast Regional Office

MGS/lm

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD Service - 1-800-298-2207.

DEP on the World Wide Web: <http://www.mass.gov/dep>

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